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Attorneys for Defendants Technip Italy S.p.A. and Technip S.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HOVENSA L.L.C.,

Plaintiff,

Case No.: 08 CIV. 1221 (NRB)

-vs-

TECHNIP ITALY S.P.A and
TECHNIP S.A.,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon Defendants' Notice of Motion, the accompanying Memorandum of Law in support thereof dated April 18, 2008, the Declaration of Etienne Gory dated April 17, 2008, the Declaration of Patrick Picard dated April 17, 2008, the Declaration of Christopher Paparella dated April 17, 2008, and the prior pleadings and proceedings held herein, Defendants Technip Italy S.p.A. and Technip S.A., by their undersigned attorneys, will move this Court, before the Honorable Naomi R. Buchwald, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to (i) Rule 12(b)(7) of the Federal Rules of Civil Procedure dismissing Plaintiff's Complaint in its entirety; (ii) Rule 12(b)(6) dismissing Counts One, Three and Four of Plaintiff's Complaint; (iii) Rule 12(b)(2) dismissing Plaintiff's Complaint in its entirety as against Defendant Technip S.A.; and (iv) such other and additional relief as the Court deems just and proper.

Dated: New York, New York
April 18, 2008

HUGHES HUBBARD & REED LLP

By: 
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To: Gabriel Del Virginia
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Attorneys for Plaintiff Hovensa L.L.C.

CERTIFICATE OF SERVICE

I, William J. Sanchez, am over the age of eighteen (18) years, not a party to this action, so caused a true and correct copy of the foregoing Notice of Motion, dated April 18, 2008, Defendant's Memorandum of Law in Support of Their Motion to Dismiss dated April 18, 2008, Declaration of Patrick Picard, dated April 17, 2008, Declaration of Etienne Gory, dated April 17, 2008, the Declaration of Christopher Paparella, dated April 17, 2008, and Defendant's Corporate Disclosure Statement to be served on this 18th day of April, 2008, to the following:

VIA ELECTRONIC FILING & FEDEX:

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VIA E-MAIL:

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ATTORNEYS FOR PLAINTIFF HOVENSA

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2008
New York, New York

/s/ William J. Sanchez
William J. Sanchez